

**ILLINOIS COMMERCE COMMISSION****Office of General Counsel****ORIGINAL**April 2, 2001 **RECEIVED****VIA AIRNET EXPRESS**

APR - 3 2001

**FCC MAIL ROOM**

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W. Counter TWA 325  
Washington, DC 20554

Re: In re Numbering Resource Optimization, CC Docket No. 99-200/

Dear Ms. Salas:

Pursuant to 47 C.F.R. Section 1.1206(b)(1) enclosed please find two copies of a letter dated March 30, 2001, from Myra L. Karegianes to Yog Varma.

I would appreciate acknowledging receipt of the filing by returning a duplicate time-stamped copy of this letter in the enclosed self-addressed stamped envelope.

Thank you for your attention to this matter.

Sincerely,

Thomas R. Stanton  
Counsel for the Illinois Commerce Commission

Enclosures

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**ILLINOIS COMMERCE COMMISSION**

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Federal Communications Commission  
Yog Varma  
Deputy Bureau Chief  
Common Carrier Bureau  
445 Twelfth Street, S.W.  
Room 5-C352  
Washington, DC 20554

Dear Yog Varma:

As you are aware, currently before the Commission is the Illinois Commerce Commission's ("ICC") Expedited Petition to Reset the Mandatory Expiration Date of Its Temporary Waiver of 47 C.F.R Section 52.19(c)(3)(ii) to Reflect the Exhaust of the 847 NPA, the First of the Five Area Codes in the Chicago Metropolitan Area to Reach Exhaust. In its petition, the ICC requested that the Commission reset the mandatory expiration date of the temporary waiver of the ten-digit for a period not to exceed eighteen months from the activation of the 224 overlay NPA. In discussions regarding the petition, Commission staff members have expressed concern that the ICC's petition does not include a currently identifiable mandatory expiration date.

In an effort to allay those concerns, the ICC is proposing to reset the mandatory expiration date to include a date certain, March 31, 2002. The temporary waiver would begin on April 1, 2001 and end on March 31, 2002. Although the ICC has successfully forestalled exhaust through conservation and reclamation efforts, only a handful of full NXX codes are currently available for assignment to service providers in the 847 NPA. If our proposal is accepted, we do not anticipate the need for an additional reset of the expiration date of the waiver.

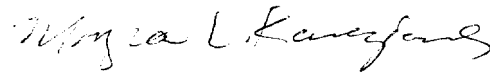
In its petition, the ICC relied on area code exhaust forecasts prepared by the North American Numbering Administrator ("NANPA"). We have subsequently learned, however, that the information given by service providers in Illinois to NANPA, which is the basis for NANPA's exhaust projections, is incomplete, inaccurate, and therefore unreliable. On February 13, 2001, the ICC held a meeting to discuss the reported exhaust of NXX codes in the 847 NPA. At that meeting, a representative from NeuStar, Inc., the NANPA, indicated that when the company receives applications from service providers for growth NXX codes, it does not verify

whether service providers requesting such NXX codes have met the Commission's (or a state commission's ) utilization threshold requirements. Rather, NeuStar assumes the data submitted to be correct and the utilization thresholds met. (Tr. 14-16, 72-74). In addition, the NeuStar representative, after reviewing the September 2000 utilization and forecast data submitted by service providers in Illinois, informed the Commission that the data is "not incredibly accurate" and, in fact, such data has been "historically inaccurate." (Tr. 16, 72). When making area code relief decisions, the ICC must have complete, accurate, and reliable information. Therefore, the ICC requests that the Commission require NANPA to certify to the accuracy and reliability of the information.

Finally, the ICC reiterates its belief that wireless-only area code overlays can help ease the accelerating pace of exhaust of existing area codes and lessen the substantial inconvenience area code relief places on customers. The ICC has filed comments in the Numbering Resource Optimization proceeding describing the benefits of technology-specific overlays and encouraging Commission to allow state commissions to implement technology-specific overlays.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, reading "Myra L. Karegianes".

Myra L. Karegianes  
General Counsel